

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

v.

**MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS, III,
ARIAS AGENCIES, S.A. ARIAS
HOLDINGS, LLC, AMERICAN INCOME
LIFE INSURANCE COMPANY,**

ELECTRONICALLY FILED

Defendants.

**DEFENDANT AMERICAN INCOME LIFE INSURANCE COMPANY’S MOTION FOR
LEAVE TO REPLY TO PLAINTIFF’S RESPONSE IN OPPOSITION TO AIL’S
MOTION TO CONFIRM ARBITRATION AWARD**

Defendant American Income Life Insurance Company (“AIL”) respectfully requests that the Court grant it leave to file a Reply in Support of its Motion to Confirm Arbitration Award (Docket No. 126), stating as follows:

1. On March 13, 2024, AIL filed its Motion to Confirm Arbitration Award. (Docket No. 126).
2. On March 18, 2024, Plaintiff filed her Response in Opposition to AIL’s Motion to Confirm Arbitration Award. (Docket No. 130).
3. Pursuant to Rule 3 of this Court’s Standing Order and Procedures on Civil Motion Practice (“Standing Order”), the Court must grant leave for a party to file a Reply in support of a non-dispositive motion.

4. Because Plaintiff has made the novel argument in her Response that the Arbitration Panel's Final Order dismissing with prejudice all claims that this Court ordered arbitrated cannot be confirmed by the Court under the Federal Arbitration Act, good cause exists to permit AIL to file a Reply in Support of its Motion.

5. Further, Plaintiff has selectively quoted the transcript of the conference preceding the Panel's Final Order and AIL therefore seeks to clarify the record.

6. Pursuant to Rule 6(c) of the Standing Order, AIL's reply will not exceed ten (10) pages and will be filed on or before March 25, 2024.

7. Accordingly, AIL respectfully requests leave to file a short Reply addressing this argument on or before Monday, March 25, 2024.

8. AIL has not met and conferred with Plaintiff regarding this procedural motion.

WHEREFORE, AIL respectfully requests that the Court grant it leave to file a Reply to Plaintiff's Response in Opposition to its Motion to Confirm Arbitration Award.

Dated: March 18, 2024

Respectfully submitted,

By: /s/ Andrea M. Kirshenbaum

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**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2024 a true and correct copy of the foregoing document was served and filed using the Western District of Pennsylvania's ECF system, through which this document is available for viewing and downloading, causing a notice of electronic filing to be served upon the following counsel of record:

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